

QUINN EMANUEL URQUHART & SULLIVAN LLP

51 Madison Avenue, 22nd Floor

New York, New York 10010

Susheel Kirpalani

James C. Tecce

Eric M. Kay

*Special Counsel to the Official Committee of Unsecured
Creditors of Lehman Brothers Holdings Inc., et al.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | |
|---|----------------------------------|
| -----X | |
| In re: | : Chapter 11 |
| | : Case No. 08-13555 (JMP) |
| LEHMAN BROTHERS HOLDINGS INC., et al., | : Jointly Administered |
| | : |
| Debtors. | : |
| -----X | |
| In re: | : SIPA Proceeding |
| | : Case No. 08-01420 (JMP) |
| LEHMAN BROTHERS INC., | : |
| | : |
| Debtor. | : |
| -----X | |

NOTICE OF APPEAL

The Official Committee of Unsecured Creditors of Lehman Brothers Holdings Inc., et al. (the "Committee"), by and through its undersigned counsel, hereby appeals to the United States District Court for the Southern District of New York, pursuant to 28 U.S.C. § 158(a) and Federal Rules of Bankruptcy Procedure 8001(a) and 8002(a), from the Order Denying Motion Of Official Committee Of Unsecured Creditors Of Lehman Brothers Holdings Inc., Et Al., Pursuant To 11 U.S.C. § 105(A), Fed. R. Civ. P. 60(B), And Fed. R. Bankr. P. 9024, For Relief From Order Under 11 U.S.C. §§ 105(A), 363, And 365 And Federal Rules Of Bankruptcy Procedure 2002, 6004 And 6006 Authorizing And Approving (A) Sale Of Purchased Assets Free And Clear Of Liens And Other Interests And (B) Assumption And Assignment Of Executory Contracts

And Unexpired Leases, Dated September 20, 2008 (And Related SIPA Sale Order) (Docket No. 18541 in Case No. 08-13555 and Docket No. 4407 in Proceeding No. 08-01420) (collectively, the "Orders") entered in the above-captioned cases on July 15, 2011, by the United States Bankruptcy Court for the Southern District of New York (Hon. James M. Peck) (the "Bankruptcy Court"). Copies of the (i) Orders and (ii) related Memorandum Opinion¹ (Docket No. 14612 in Case No. 08-13555 and Docket No. 4105 in Proceeding No. 08-01420) are attached as Exhibits A – C, respectively.

The names of all parties to this appeal and the names, addresses and telephone numbers of their respective counsel are as follows:

Appellant and Counsel:

Official Committee of Unsecured
Creditors of Lehman Brothers Holdings Inc., et al.

Quinn Emanuel Urquhart & Sullivan LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
Susheel Kirpalani
James C. Tecce
Eric M. Kay

Appellee and Counsel:

Barclays Capital Inc. and Barclays Bank PLC
Boies, Schiller & Flexner LLP
575 Lexington Avenue
New York, NY 10022
(212) 446-2300
Jonathan D. Schiller
Hamish P.M. Hume
Jack G. Stem

¹ Opinion On Motions Seeking Modification Of The Sale Order Pursuant To Rule 60(b), The Trustee's Motion For Relief Under The SIPA Sale Order, Barclays' Cross-Motion To Enforce The Sale Orders And Adjudication Of Related Adversary Proceedings, dated February 22, 2011.

Other Party to Appeal and Counsel:

Lehman Brothers Holdings Inc., et al.

Jones Day

222 East 41st Street

New York, New York 10017

Telephone: (212) 326-3939

Facsimile: (212) 755-7306

Robert W. Gaffey

William J. Hine

Dated: July 28, 2011
New York, New York

**QUINN EMANUEL URQUHART
& SULLIVAN, LLP**

/s/ James C. Tecce

Susheel Kirpalani

James C. Tecce

Eric M. Kay

51 Madison Avenue, 22nd Floor

New York, New York 10010

Telephone No.: (212) 849-7000

*Special Counsel to the Official Committee Of
Unsecured Creditors Of Lehman Brothers
Holdings Inc., et al.*